## **EXHIBIT B**

From: Valentine, Dawn

**Sent:** Wednesday, November 21, 2018 1:06 PM

To: Stephen C. Steinberg; Tiffany S. Hansen; mark@palmerlex.com
Cc: Weikert, Robert; May, David; Kunze, Deanna; Wiser, Jennette

**Subject:** RE: Stardock v. Reiche and related counterclaims--Litigation Schedule

Steve.

Are you are available for a phone conference with me and Rob today at 2:00?

If so, we will circulate a call-in number.

Thanks,

## Dawn

**From:** Stephen C. Steinberg <ssteinberg@BZBM.com> **Sent:** Wednesday, November 21, 2018 12:43 PM

To: Valentine, Dawn <dvalentine@nixonpeabody.com>; Tiffany S. Hansen <thansen@BZBM.com>;

mark@palmerlex.com

Cc: Weikert, Robert <rweikert@nixonpeabody.com>; May, David <DMay@nixonpeabody.com>; Kunze, Deanna

<dkunze@nixonpeabody.com>; Wiser, Jennette <jwiser@nixonpeabody.com>
Subject: RE: Stardock v. Reiche and related counterclaims--Litigation Schedule

Dawn,

Re: all issues related to GOG, as you are no longer representing them, I will address those with its new counsel, who I understand is Jessica Medina.

We disagree about the state of the pleadings justifying a further extension. Stardock has already amended several times, and the adequacy of its fourth amended complaint will be addressed concurrently with the motion to dismiss before the current discovery cutoff. We also disagree about the other pending motions justifying further discovery by Stardock. Re: Valve having more time to review and propound discovery, they are represented by the same counsel so I am not sure why you need more time to review. The claims against Valve are the same as those against Stardock, which has already served three rounds of written discovery, so I am also not sure what additional discovery is needed. But if there is anything specific to Valve, that can certainly be addressed with an extra month tacked on to the month we still have left for fact discovery. And we have already noticed Valve's deposition for a date before the current cutoff.

Re: mediation, I will talk to my clients, but my concern is that this will be an excuse to delay the completion of discovery and resolution of this case. Thus, I would only be inclined to agree if: a) we can agree on a mediator and mediation date in the very near future, i.e. in December or perhaps early January; b) we can agree on dates for all of the noticed depositions shortly thereafter, i.e. in January; and c) we can agree to a limited extension of the case schedule to accommodate the above, i.e. maybe we push the fact discovery cutoff to early-mid February. Let me know your thoughts on this and I'd also be happy to discuss by phone later today or on Friday.

Steve

Stephen C. Steinberg
Principal
BARTKO ZANKEL BUNZEL & MILLER
One Embarcadero Center, Suite 800

San Francisco, CA 94111 Phone: (415) 291-4523

Email: <a href="mailto:ssteinberg@bzbm.com">ssteinberg@bzbm.com</a>

www.bzbm.com